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BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.

In the Matter of)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	
Petition for Declaratory Ruling and Request)	CC Docket No. 96-98
for Expedited Action on the July 15, 1997)	
Order of the Pennsylvania Public Utility)	
Commission Regarding Area Codes 412, 610,)	
215, and 717)	

**PETITION FOR RECONSIDERATION OF THE
CELLULAR TELECOMMUNICATIONS & INTERNET ASSOCIATION**

The Cellular Telecommunications & Internet Association ("CTIA"),¹ pursuant to section 1.429 of the Commission's Rules, 47 C.F.R. § 1.429, hereby submits its Petition for Reconsideration in the above captioned proceeding.²

I. INTRODUCTION AND SUMMARY

In its ongoing efforts to improve the efficiency with which numbering resources are utilized, the Commission adopted in the Second Report and Order several requirements which

¹ CTIA is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the association covers all Commercial Mobile Radio Service ("CMRS") providers and manufacturers, including cellular, broadband PCS, ESMR, as well as providers and manufacturers of wireless data services and products.

² See Numbering Resource Optimization, Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717, CC Docket No. 99-200 and CC Docket No. 96-98, Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, FCC 00-429 (rel. Dec. 29, 2000) ("Second Report and Order").

warrant reconsideration. CTIA and its members are committed to working with the Commission to ensure that both the administrative and technical measures designed to realize greater utilization levels are fully implemented by CMRS providers. The Commission, however, in its drive to improve numbering utilization, has in some respects acted precipitously, summarily dismissing important concerns raised by the mobile wireless industry. CTIA respectfully requests that the Commission reconsider two aspects of its Second Report and Order: (1) its decision to hold facilities-based carriers responsible for the utilization levels of resellers, and (2) its decision not to permit a phased roll-out of CMRS number pooling and porting.

First, in the administrative reporting measures designed to improve monitoring of carriers' utilization levels, the Commission erred in concluding that "intermediate numbers" would be excluded from a carrier's utilization calculation. Numbers assigned by facilities-based carriers to resellers are no longer in the control of the underlying carrier. In fact, imposing upon the underlying carrier the duty to report a reseller's utilization levels is inconsistent with the Commission's Rules and eliminates any incentive for resellers to use numbers efficiently. CTIA therefore respectfully requests that "intermediate numbers" either be included in the numerator or excluded from the denominator of a carrier's utilization calculation.

Second, the Commission's decision combining portability and pooling deadlines for CMRS providers exhibits an impermissible indifference to potential costs and benefits. Several CMRS providers explained that the conversion to pooling imposes certain specific burdens on CMRS networks that ideally would be addressed on a gradual basis. Instead of heeding these concerns, the Commission simply states that it is unpersuaded by carrier reports and, regardless, CMRS carriers have been aware of their obligations for several years. Without evidence to the contrary, prudence counsels that the Commission rely on carrier statements when they concern

complex modifications to networks the effects of which cannot be completely anticipated and when the consequences of small defects can be very large. Rejection of these concerns solely because carriers have had years to address them is untenable, especially where the Commission has moved the goal posts by first ordering carriers to provide porting, and then, with no review of the consequences to the network, requiring carriers to simultaneously port and pool. Experience shows that even with all of the planning that goes into complex network modifications, unexpected events are extremely likely. Recognizing this, it is prudent for the Commission to permit a phased-in transition to pooling to be followed by porting, to minimize any adverse consequences to network reliability.

II. THE COMMISSION SHOULD RECONSIDER ITS DECISION TO EXCLUDE INTERMEDIATE NUMBERS IN CARRIERS' UTILIZATION CALCULATIONS.

In the Second Report and Order, the Commission concluded that “intermediate numbers” will continue to be excluded from a carrier’s utilization calculations until they have been assigned to an end user.³ Intermediate numbers are “numbers that are made available for use by another carrier or non-carrier entity for the purpose of providing telecommunications service to an end user or customer.”⁴ Examples of intermediate numbers include numbers assigned to resellers, retail dealers, and unified messaging providers.⁵ In deciding to exclude these numbers from a carrier’s utilization calculation, the Commission reasoned that such a policy would more

³ Second Report and Order, ¶ 30; see Numbering Resource Optimization, Docket No. 99-200, *Report and Order and Further Notice of Proposed Rulemaking*, 15 FCC Rcd 7574, ¶ 21 (2000) (“First Report and Order”) (Once an intermediate number is assigned to an end-user by a reseller or retail dealer, the underlying carrier can categorize the number as “assigned” for purposes of making its utilization calculations.).

⁴ First Report and Order, ¶ 21.

⁵ Id. ¶ 20.

accurately reflect usage levels. While this may be true, requiring facilities-based carriers to report the usage levels of resellers and, in effect, making these carriers responsible for resellers' utilization of numbering resources is entirely inconsistent with existing regulations and Commission precedent.

For CMRS carriers, the vast majority of "intermediate numbers" are numbers assigned to resellers. Under the Commission's resale rules, a CMRS carrier "must permit unrestricted resale of its services."⁶ The intersection of the Commission's resale policies with its number reporting requirements was apparently overlooked by the Commission when it placed the burden on facilities-based carriers to report resellers' utilization levels.

In 1996, the Commission modified its CMRS resale requirements to make clear that "no provider may offer like communications services to resellers at less favorable prices, terms, or conditions than are available to other similarly situated customers, absent reasonable justification."⁷ Presumably, a facilities-based carrier could not withhold numbers from a reseller, regardless of that reseller's utilization levels, unless the Commission decides that doing so would not be unreasonable.⁸ Ignoring this leads to an impermissible result: the Commission has imposed disparate regulatory systems on competing entities without a valid basis for doing so. Resellers would seem to have unlimited access to numbering resources while their competitors, facilities-based carriers, do not.

⁶ 47 C.F.R. § 20.12(b).

⁷ Interconnection and Resale Obligations Pertaining to Commercial Mobile Radio Services, Docket No. 94-54, *First Report and Order*, 11 FCC Rcd 18455, ¶ 12 (1996).

⁸ See Interconnection and Resale Obligations Pertaining to Commercial Mobile Radio Services, Docket No. 94-54, *Memorandum Opinion and Order*, 14 FCC Rcd 16340, ¶ 54 (1999) (concluding that a refusal to respond to a reseller's request or to address other options, would constitute an unreasonable request).

Not only does it appear prohibited under the Commission's Rules, as a practical matter, it is highly unlikely that resellers would voluntarily share their numbering utilization levels with facilities-based carriers. Because a reseller's utilization reveals important subscribership information, these data tend to be confidential. Unless the Commission required resellers to provide such data to their competitors, they likely would not.

Finally, the exclusion of intermediate numbers from a carrier's utilization calculation creates an incentive for resellers to intentionally withhold utilization information from carriers. So long as an underlying carrier cannot include intermediate numbers assigned to resellers in its utilization calculations, the carrier's utilization levels will be lower thereby inhibiting its ability to get additional numbering resources. For example, if a carrier is at a 50% utilization level in a particular NXX block and has assigned an additional 40% of the available numbers to a reseller, that carrier cannot obtain numbering resources even though 90% of the numbers assigned to it are unavailable. Unless and until the reseller reports to the carrier which numbers have been assigned to end users, the carrier is unable to obtain additional numbering resources to serve potential customers while the reseller effectively has unlimited supply.

The Commission should reconsider its decision to hold facilities-based carriers liable for the numbering usage of resellers. Either resellers should be required to report separately their utilization levels, or more appropriately, "intermediate numbers" should be added to the numerator or excluded from the denominator in the assigning carrier's utilization calculations.

III. THE COMMISSION FAILED TO ADEQUATELY CONSIDER THE NEED FOR A TRANSITION PERIOD BETWEEN THE DATE CMRS CARRIERS DEPLOY NUMBER PORTABILITY TECHNOLOGY AND THE DATE THEY BEGIN NUMBER POOLING.

In the Second Report and Order, the Commission declined to adopt a transition period for the deployment of number pooling by CMRS providers, concluding instead that there was not

sufficient evidence in the record supporting such a transition. The Commission's decision appears to be based almost exclusively on its conclusion that CMRS "[c]arriers have been on notice for several years that they must comply with [the] LNP requirements by November 24, 2002."⁹ Dismissal on this basis is inconsistent with Commission precedent and, more importantly, may unnecessarily put CMRS service quality at risk.

As an initial matter, there is an important disconnect between the Commission's premise that carriers are on notice of the number portability deadline and its conclusion that they therefore can and should fully implement pooling on the same deadline. While the deployment of number portability technology is a necessary precondition for implementing number pooling, portability and pooling are two distinct processes that will likely have different effects on CMRS networks and operational support systems associated with telephone number administration.¹⁰ The Commission, however, for its purposes, has merged these separate obligations without adequate explanation.

Moreover, the Commission has improperly dismissed record concerns regarding network reliability. Instead, it concludes that "carriers have not explained why any potential risks could not be anticipated and addressed prior to the LNP implementation deadline."¹¹ This reasoning is circular and cannot serve as the basis for rejecting a transition to number pooling. Of course "potential risks" that can be anticipated will be addressed by carriers. The fact of the matter is that not all risks can be anticipated. Ultimately, system anomalies resulting from pooling may

⁹ Second Report and Order, ¶ 50, n.126.

¹⁰ They also are directed at entirely distinct public purposes – the reduction of customer switching costs and the extension of the life of the existing North American Numbering Plan.

¹¹ Second Report and Order, ¶ 51.

prove minimal and perhaps unnoticeable to consumers. On the other hand, they might not be. One thing is sure -- there will be unanticipated effects to CMRS networks resulting from the conversion to number pooling. What is unknown and unknowable at this time is the magnitude of those effects -- thus the basis for carrier requests for a gradual transition to number pooling to minimize any impact on consumers.

A. The Commission Improperly Dismissed Carrier Concerns Over The Effects Number Pooling Will Have On CMRS Networks.

CMRS carriers have persuasively demonstrated in the record that an appropriate transition period between the deployment of LNP and the implementation of pooling will avoid unnecessary risks to the integrity of wireless networks. Although pooling is dependent upon LNP infrastructure, implementation of pooling requires additional and separate technical requirements that cannot be overlooked.¹² As the record shows, CMRS implementation of LNP is already a complex undertaking due to the unique demands of roaming capability.¹³ Commenters have demonstrated that simultaneously adding the additional technical demands of pooling on top of LNP implementation could in fact impose unacceptable strain to CMRS networks.

In its comments, VoiceStream explained, “carriers undoubtedly will face unexpected circumstances while implementing LNP, and they should be free to address these circumstances

¹² See, e.g., Numbering Resource Optimization, Docket No. 99-200, Comments of BellSouth at 11 (filed May 19, 2000) (“BellSouth May 2000 Comments”); Numbering Resource Optimization, Docket No. 99-200, Comments of GTE at 9 (filed May 19, 2000) (“GTE May 2000 Comments”).

¹³ See Numbering Resource Optimization, Docket No. 99-200, Comments of Sprint at 12 (filed May 19, 2000) (“Sprint May 2000 Comments”); Numbering Resource Optimization, Docket No. 99-200, Comments of SBC at 13 (filed May 19, 2000) (“SBC May 2000 Comments”).

without the additional burden of implementing number pooling, which is an entirely separate procedure.”¹⁴ It further explained in some detail the technical measures needed to ensure proper implementation of pooling, including modifying and testing Local Service Management Systems, Service Control Points, Service Order Administration systems, operation support systems, and switches.¹⁵ Further, as GTE explained, industry experience with wireline LNP has shown that carriers will need to troubleshoot technical difficulties for some time following LNP implementation, including resolving database issues.¹⁶ Along with other comments in the record, these carriers have demonstrated that the complicated nature of LNP combined with number pooling implementation will significantly increase the risk of service disruptions. Additionally, commenters have argued that simultaneous implementation of LNP and pooling is further complicated by a number of other technical factors and regulatory requirements that will be imposed during the same timeframe. For example, carriers are also in the process of implementing the technical requirements of E911 and CALEA.¹⁷ In addition, carriers will also be in the process of coordinating with both the National Pooling Administrator and the new NANPA.¹⁸ Finally, all of these technical requirements will be imposed during the time of the year in which the wireless industry generally avoids technical upgrades due to substantially

¹⁴ Numbering Resource Optimization, Docket No. 99-200, Comments of VoiceStream at 14 (filed May 19, 2000) (“VoiceStream May 2000 Comments”).

¹⁵ Id. at 14; see SBC May 2000 Comment at 13.

¹⁶ GTE May 2000 Comments at 9.

¹⁷ See BellSouth May 2000 Comments at 11.

¹⁸ See VoiceStream May 2000 Comments at 14.

increased call volume and the large number of subscribers that are added to the network.¹⁹ As carriers have demonstrated, together these technical challenges pose significant risks to the quality of the network, which could be significantly mitigated by requiring sequential rather than simultaneous implementation of LNP and number pooling.

In dismissing these concerns, the Commission stated that CMRS carriers have been on notice of the number portability and pooling obligations for several years and that it was not convinced by the record that a transition was needed.²⁰ On reconsideration, the Commission should recognize that a transition to number pooling instead of a flash-cut approach is the prudent course of action to ensure that the quality of CMRS service and the integrity of CMRS networks is maintained. The Commission should therefore grant a phase-in for CMRS number pooling because doing so would be consistent with (1) its historical concern over protecting the integrity of the telecommunications network and (2) the actual concerns of carriers -- the parties that best know the inner workings of CMRS networks and the vulnerability that can lead to system disruptions. Doing so could reduce the risk and the magnitude of problems that could occur in the event of network disruptions.

The Commission has a long tradition of taking proactive measures aimed at ensuring that the reliability of telecommunications networks remain uncompromised.²¹ Indeed, the

¹⁹ Id.; see Sprint May 2000 Comments at 12.

²⁰ See Second Report and Order, ¶ 50.

²¹ See, e.g., Minimizing Regulatory and Information Technology Requirements That Could Adversely Affect Progress Fixing the Year 2000 Date Conversion Problem, Year 2000 Network Stabilization Policy Statement, 14 FCC Rcd 20139, ¶ 7 (1999) (recognizing that Commission regulation can at times impact carrier efforts at maintaining network integrity, and, importantly, that “[e]nsuring the health of the critical communications ‘nervous system’ is the collective task of industry, the Commission, and other interested stakeholders. . . .”).

Commission itself has said that it considers “network reliability to be of paramount importance” when considering LNP deployment.²² Recent actions, such as the establishment of the Network Reliability Council, show a continued interest in preserving the integrity of telecommunications systems.²³ Therefore, the Commission should not now, given its prior commitment to preserving wireline network integrity, ignore calls for a transition period for CMRS number pooling to ensure there is no network degradation as wireless carriers begin implementing LNP and pooling.

Statements in the record from wireless carriers attesting to the potential risk for network disruption should have given the Commission sufficient pause about a decision that may increase the adverse affects from the conversion to pooling. The Commission has instead underestimated the evidence from carriers and is essentially second guessing the industry about the technical implications and limitations of wireless networks. FCC and judicial precedent, however, require the Commission to take very seriously carriers’ network reliability concerns. Several federal courts have stated that before making a decision that would negatively affect a carrier’s network, agencies that regulate the telecommunications industry should look to carrier-provided evidence

²² Telephone Number Portability, Docket No. 95-116, *First Memorandum Opinion and Order on Reconsideration*, 12 FCC Rcd 7236, ¶ 83 (1997). See also Telephone Number Portability, Docket No. 95-116, *Third Memorandum Opinion and Order on Reconsideration*, 13 FCC Rcd 16090, ¶ 10 (1998) (“We continue to believe that network reliability is of the utmost importance.”).

²³ See FCC Establishes Advisory Committee to Enhance Network Reliability, *Public Notice*, 1991 FCC LEXIS 6622 (rel. Dec. 13, 1991); see also Matter of Intelligent Networks, Docket No. 91-346, *Notice of Inquiry*, 6 FCC Rcd 7256 (1991) (initiated to determine the interrelationship of Open Network Architecture with emerging network design, focused on “encourag[ing] development of future local exchange networks that are as open, responsive, and procompetitive as possible, consistent with [its] public interest goals such as ensuring network reliability and integrity”).

related to network reliability.²⁴ Moreover, in its decision to grant a carrier a waiver of rules which prevent carriers from offering detection devices that attach to the network, the Commission reviewed substantive evidence presented by over 20 participants in the proceeding and noted:

Our primary concern in considering these waiver requests is that stutter dial tone detection devices not harm the public switched telephone network. . . Our decision to grant a waiver only for stutter dial tone detection devices that do not perform periodic checks is based on the information in the record before us.²⁵

Similarly, a review of the comments filed in this record demonstrates the need for more serious analysis of carriers' concerns. The prudent course of action would be to allow a transition to pooling to minimize the possible adverse effects that pooling may have on CMRS networks.

²⁴ See U.S. West Communications, Inc. v. Jennings, 46 F.Supp. 2d 1004, 1016 (D.Ariz. 1999) (Upon agreeing with the carrier's contention that a state commission order would compromise network reliability and could lead to service outages, the court remanded to the agency to consider the carrier's concerns and determine a more efficient manner to facilitate unbundling in a manner that would minimally impact the network). Courts have upheld congressional interest in preserving the integrity of carrier networks, exemplified by the 1996 Act provision which relieves ILECs from the obligation of satisfying interconnection requests if doing so would be adverse to network reliability, albeit by clear and convincing evidence to the state commission. US West Communications, Inc. v. Boyle, 1999 U.S. Dist. LEXIS 22331 (D.Neb. 1999); U.S. West Communications, Inc. v. Minnesota Public Utilities Commission, 55 F.Supp. 2d 968 (Minn. 1999); MCI Telecommunications Corp. v. Michigan Bell Tel. Co., 79 F.Supp. 2d 768 (E.D. Mich. 1999); US West Communications, Inc. v. Garvey, 1999 U.S. Dist. LEXIS 22042 (D.Minn. 1999).

²⁵ Part 68 Waiver Request of Alameda Engineering, Inc., et al, Order, 10 FCC Rcd 12135 (1995) (Before granting a waiver of rules prohibiting the offering of a device that detects the presence of a "stutter dial tone" (a series of short separate tones produced by the telephone company's central switching office that alerts a voice mail subscriber that he or she has voice mail), the Commission considered filings from the party making the request and other commenting carriers on the effect of the detection device on the integrity of the telephone network).

B. The Commission Improperly Relies On “Notice” As A Basis For Dismissing Carrier Network Reliability Concerns.

The Commission appears to place great emphasis on the fact that CMRS providers have been on notice of their numbering obligations for some time. This fact, while true, is a red herring. Wireline carriers were also on notice of their number portability and pooling obligations for several years, yet the Commission established a transition to these systems to ensure network reliability.

In 1996, the Commission established a roll-out schedule for the deployment of wireline LNP explaining that “a phased deployment is preferable to implementing nationwide number portability simultaneously in all markets (or implementing this service in multiple large MSAs at the same time) because a phased deployment would be less likely to impose a significant burden on those carriers serving multiple regions of the country.”²⁶ It went on to note that the schedule was based on commenter representations and assuming “the absence of any significant technical problems in deployment.”²⁷ Even after adopting a lengthy transition for wireline LNP, the Commission extended particular carriers’ deployment schedules for the purpose of addressing network reliability concerns. In one instance, the FCC granted an extension after considering, among other things, the carrier’s statements explaining its deployment problems and its concern over network reliability.²⁸ This was true even though the wireline carrier was on notice for over two years that it would have to deploy number portability by a date certain.

²⁶ Telephone Number Portability, Docket No. 95-116, *First Report and Order and Further Notice of Proposed Rulemaking*, 11 FCC Rcd 8352, ¶ 81 (1996).

²⁷ Id. ¶ 78.

²⁸ See Telephone Number Portability; Petitions for Extension of the Deployment Schedule for Long-Term Database Methods for Local Number Portability, Docket No. 95-116, *Order*, 13 FCC Rcd 9578, ¶ 13 (1998) (The FCC granted the extension, concluding that

With respect to number pooling, the Commission has also permitted a phased deployment for wireline carriers even though wireline LNP technology will have been deployed successfully for several years once nationwide pooling is begun.²⁹ The Commission's decision was based on several factors, including concerns that possible network disruptions might occur as a result of the conversion.³⁰ It recognized that a staggered rollout of number pooling, including only three NPAs per NPAC region per quarter, was necessary even though the Commission had concluded “that the majority of the technical issues concerning thousands-block number pooling have been resolved in industry fora, and the industry's agreement on technical standards for this strategy is reflected in the promulgation of [an approved standards document].”³¹ Thus, wireline carriers in the largest markets will have had approximately four years between the deployment of portability, which began in 1997,³² and the initiation of pooling to resolve technical obstacles and develop pooling standards. The concerns which warrant a measured approach for wireline portability and pooling are applicable to wireless carriers as well.

Finally, wireline LNP continues to have its own technical difficulties. Even after over 2 years of wireline LNP, there are still problems, such as in the Local Service Management

“under the circumstances presented here, the goal of efficient development of number portability will be best served by allowing the SBC Companies additional time. . .” to implement software and hardware upgrades.).

²⁹ After a pooling administrator is selected, the first carriers, in limited markets, will have an additional nine months to begin pooling. Then the Commission will release quarterly a list of three NPAs from each NPAC region within the largest 100 MSAs that will be subject to pooling. First Report and Order, ¶ 161.

³⁰ Id. ¶¶ 157-159.

³¹ Id. ¶ 126.

³² Telephone Number Portability, CC Docket No. 95-116, *First Memorandum Opinion and Order on Reconsideration*, 12 FCC Rcd 7236, Appendix E (1997).

Systems (“LSMS”), which have not been resolved. For instance, the data downloads used to enter new routing information for a ported number is often affected by service providers with slow LSMS or network problems, commonly referred to as “partial LSMS failures.” When this happens, customer requests to port their numbers go into pending status and do not get activated. The LSMS partial failure rates for wireline systems continue to cause several thousand users a month to go without ported service. While this issue was raised in 1998, the appropriate committees are still attempting to develop a resolution. Once wireless pooling and porting is added to the mix, it is widely anticipated that problems such as this will be exacerbated.

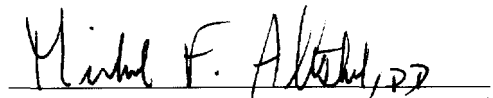
That CMRS carriers have been aware of the number portability deadline is not especially relevant and certainly not determinative. Anomalies will occur in instances such as this where the Commission is ordering complex changes to complex networks. The Commission therefore should reconsider its decision to deny carriers an opportunity to conduct an orderly transition by de-linking portability and pooling deadlines. CTIA acknowledges the Commission’s interest in securing efficient number pooling. Notwithstanding this important concern, the delay caused by a transition to pooling is of little consequence when compared to the harms that could occur should there be network failures resulting from the flash-cut requirement associated with implementing wireless LNP with nationwide roaming and the simultaneous turn up of thousand block pooling.

IV. CONCLUSION

For the foregoing reasons, CTIA respectfully requests that the Commission reconsider its decision to exclude intermediate numbers from a carrier's utilization calculation and its decision not to adopt a transition for CMRS number pooling.

Respectfully submitted,

**CELLULAR TELECOMMUNICATIONS
& INTERNET ASSOCIATION**

A handwritten signature in black ink, appearing to read "Michael F. Altschul", is written over a horizontal line.

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